

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
Case No. 7-23-CV-897

IN RE:)
CAMP LEJEUNE WATER LITIGATION)
)
This Pleading Relates to:)
)
ALL CASES)
)

**PLAINTIFFS' LEADERSHIP GROUP'S RESPONSE TO DEFENDANT'S
MOTION TO SEAL**

On September 10, 2025, PLG filed a *Motion To Exclude Defense Expert Julie Goodman* (DE 621), along with a supporting memorandum (DE 622) and exhibits in support of same (DE 622-2 through 622-46). Because DOJ contends that portions of these filings contain confidential information, PLG provisionally filed the memorandum (DE 622) and the supporting exhibits (DE 622-1 through 622-46) under seal.

On September 22, 2025, DOJ filed a *Motion to Seal* (DE 636), seeking sealing of Gradient's invoices filed at DE 622-5, and the redaction of PLG's supporting brief, which referenced certain information in those invoices.

The parties have met and conferred regarding these matters. Based upon those discussions and agreements of the parties, PLG does not object to the sealing of DE 622 and 622-5, the filing of a redacted brief (in the form of the proposal attached to this response), and the unsealing of all other exhibits filed in support of PLG's Motion to Exclude Defense Expert Dr. Julie Goodman.

WHEREFORE, PLG does not oppose the Court entering an order:

(1) Granting the motion to seal (DE 636) in part,

- (2) ordering that DE 622 and 622-5 shall be maintained under seal pending further order of the court;
- (3) ordering that Docket Entries 622-1 through 622-4 and 622-6 through 622-46 shall be unsealed and made available on the public docket; and
- (4) ordering that the redacted brief attached to this response shall be filed as the publicly-available version of PLG's memorandum in support of its Motion to Exclude Defense Expert Dr. Julie Goodman.

Respectfully submitted this 29th day of September, 2025.

[Signatures appear on the following page]

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